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Magistrate Judge Sarah L. Cave
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Room 1670
New York, NY 10007

October 19, 2021

**RE: *Iowa Pub. Emps.' Ret. Sys. et al. v. Bank of Am. Corp. et al.*,
No. 17-cv-6221 (KPF/SLC)**

Dear Magistrate Judge Cave:

As counsel to the JPMorgan Defendants in the above-captioned action, I write on behalf of all Defendants to request permission to redact references to confidential material in Defendants' letter-motion requesting leave to file a sur-reply brief in opposition to Plaintiffs' motion for class certification. The material Defendants propose to redact and file under seal consists solely of references to expert materials that (i) have already been filed under seal pursuant to sealing orders issued by Judge Failla and (ii) were designated "Highly Confidential" by Plaintiffs pursuant to the protective order issued by Judge Failla. The Second Circuit has recognized the appropriateness of sealing confidential information. *See, e.g., DiRussa v. Dean Witter Reynolds Inc.*, 121 F.3d 818, 826 (2d Cir. 1997) (upholding trial court's decision to "safeguard . . . confidential material" by placing documents under seal).

Pursuant to Your Honor's Individual Practices and this Court's Electronic Case Filing Rules & Instructions, we are contemporaneously filing a sealed version of Defendants' letter-motion requesting leave to submit a sur-reply, with Defendants' proposed redactions highlighted.

Respectfully submitted,

/s/ Robert D. Wick

Robert D. Wick

*Counsel for the JPMorgan Defendants
writing on behalf of all Defendants*